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October 29, 2002

FILED²
OCT 29 2002
Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: BullsEye Telecom, Inc.
Interconnection Agreement

Dear Judge Roberts:

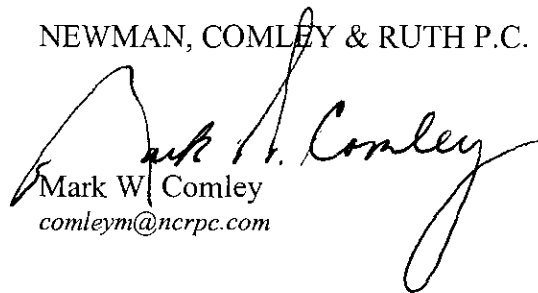
Enclosed for filing please find the original and five copies of an Application for approval of Interconnection Agreement Under the Telecommunications Act of 1996. Attachment 1 to this application is the interconnection agreement and I enclose one copy of the agreement.

If you have any questions, please advise. Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
comleym@ncrpc.com

MWC:ab
Enclosure

cc w/o enclosure: Office of Public Counsel
General Counsel
Thomas A. Marino

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
OCT 29 2002
Missouri Public
Service Commission

Application of BULLSEYE TELECOM, INC.)
for Approval of Interconnection Agreement) Case No. _____
Under the Telecommunications Act of 1996.)

APPLICATION FOR
APPROVAL OF INTERCONNECTION AGREEMENT
UNDER THE TELECOMMUNICATIONS ACT OF 1996

Comes now BULLSEYE TELECOM, INC. (hereinafter "Bullseye", or "Applicant") and hereby files this Application for Approval of a new Interconnection Agreement (the Agreement) between Pacific Bell Telephone Company, d/b/a SBC Pacific Bell Telephone Company, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company, by SBC Telecommunications, Inc. (SBC) and BULLSEYE under the Telecommunications Act of 1996 (the Federal Act) and Chapter 392, RSMo 2000, and respectfully shows the Missouri Public Service Commission (the Commission) the following:

I. THE APPLICANT

BULLSEYE is a competitive local telecommunications company engaged generally in the provision of telecommunications services. It is a Michigan corporation, duly registered and in good standing with the Missouri Secretary of State. BULLSEYE is a competitive telecommunications company operating under certificates granted by this Commission.

II. INTERCONNECTION/RESALE AGREEMENT REACHED

BULLSEYE presents to this Commission for approval an Interconnection Agreement negotiated and executed pursuant to the terms of the Federal Act (Agreement, Attachment 1). This Agreement was entered into pursuant to Section 252(a)(1) of the Federal Act, and SBC and

BULLSEYE executed the Agreement effective September 11, 2002. The General Terms and Conditions of the Agreement contains ninety-four (94) pages, and fifty-three (53) attachments follow. There are no outstanding issues between SBC and BULLSEYE that need the assistance of mediation or arbitration.

III. DESIGNATED CONTACTS

The designated contacts for purposes of this Application are:

Mark W. Comley
NEWMAN, COMLEY & RUTH P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102
Telephone: 573/634-2266
Fax: 573/636-3306
e-mail – *comleym@ncrpc.com*

and

Thomas A. Marino
Bullseye Telecom, Inc.
25900 Greenfield Road, Suite 330
Oak Park, MI 48237
Telephone: (248) 784-2500
Facsimile: (202) 955-9792

IV. REQUEST FOR APPROVAL

BULLSEYE seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. The implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, and increases customer choices for telecommunications services.

BULLSEYE respectfully requests that the Commission grant expeditious approval of this Agreement, without change, suspension or other delay in its implementation. This is a bilateral agreement, reached as a result of negotiations and compromise between competitors, and intervention by other parties is neither necessary nor appropriate.

V. STANDARD OF REVIEW

The statutory standards of review are set forth in Section 252(e) of the Federal Act which provides as follows:

(e) APPROVAL BY STATE COMMISSION

- (1) APPROVAL REQUIRED.**--Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted to shall approve or reject the agreement, with written findings as to any deficiencies.
- (2) GROUNDS FOR REJECTION.**--The State Commission may only reject --
 - (A)** an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that --
 - (i)** the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
 - (ii)** the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity;

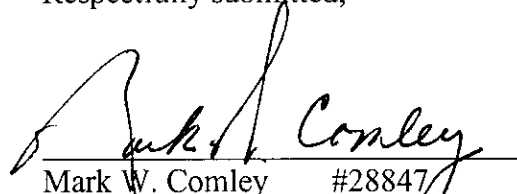
VI. MISSOURI LEGISLATION

The negotiated and executed Agreement is consistent with Chapter 392, RSMo 2000.

VII. **CONCLUSION**

For the reasons set forth above, BULLSEYE respectfully prays that the Commission approve the Agreement expeditiously.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark W. Comley", is written over a horizontal line.

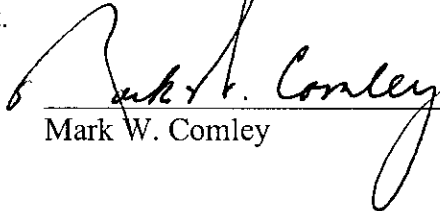
Mark W. Comley #28847
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Attorneys for BULLSEYE TELECOM, INC.

ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

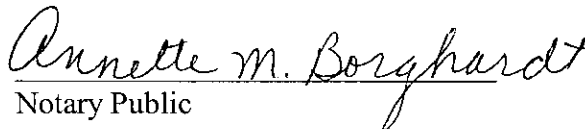
I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for BULLSEYE TELECOM, INC., Applicant in the above captioned proceeding; that I have read the above and foregoing Application and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant.



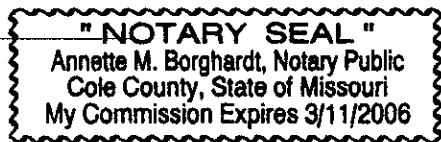
Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 29th day of October, 2002.

My Commission expires:



Notary Public



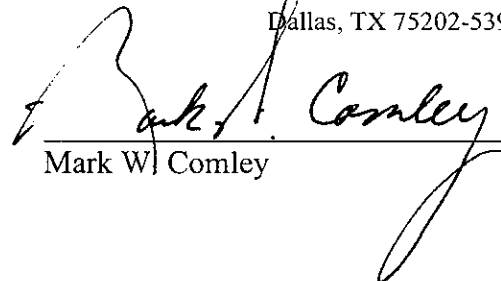
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, on this 29th day of October, 2002, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

General Counsel
P.O. Box 360
Jefferson City, MO 65102

Contract Administration
Attn: Notices Manager
311 S. Akard, 9th Fl.
Four SBC Plaza
Dallas, TX 75202-5398



Mark W. Comley